

FEDERAL COURT

B E T W E E N:

**JEREMIAH JOST, EDWARD CORNELL, VINCENT GIRCYS,
and HAROLD RISTAU**

Applicants

and

**GOVERNOR IN COUNCIL, HER MAJESTY IN RIGHT OF CANADA,
ATTORNEY GENERAL OF CANADA, and MINISTER OF PUBLIC SAFETY
AND EMERGENCY PREPAREDNESS**

Respondents

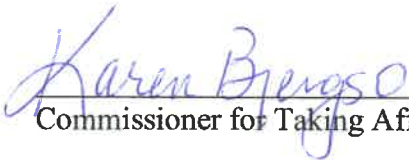
AFFIDAVIT OF DENIS BEAUDOIN

I, Denis Beaudoin, Director of Financial Crime, Federal Policing Criminal Operations
with the Royal Mounted Canadian Police, of the City of Ottawa in the Province of
Ontario, SWEAR THAT:

1. The answers set out in **Exhibit A** to this affidavit, in response to the written questions submitted by the Applicants on May 18, 2022, are true, to the best of my information, knowledge and belief.

2. I make this affidavit *bona fide*.

SWORN BEFORE ME at the City of
Ottawa, in the Province of Ontario
this 20 day of June, 2022


Commissioner for Taking Affidavit

**Karen Louise Bjergso,
A Commissioner, etc., City of Ottawa,
for the Government of Canada,
Department of Public Safety and
Emergency Preparedness.
Expires August 8, 2022**

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DENIS BEAUDOIN

This is **Exhibit "A"** referred to in the affidavit of Denis Beaudoin sworn before me on
June 20, 2022



Karen Bjergso

**Karen Louise Bjergso,
A Commissioner, etc., City of Ottawa,
for the Government of Canada,
Department of Public Safety and
Emergency Preparedness.
Expires August 8, 2022**

Exhibit A

ANSWERS TO WRITTEN EXAMINATION OF DENIS BEAUDOIN

1. I previously swore an affidavit on April 4, 2022 in this matter. This exhibit contains my answers to the written examination, which was served on counsel for the Respondent on May 18, 2022. Below is the chart setting out each question and the answer to that question or noting where an objection to the question has been made by counsel for the Respondent. Attached hereto as Annex 1 to Exhibit "A" is a chart prepared by counsel for the Respondent setting out those objections and refusals maintained by counsel for the Respondent and the basis for same.

No.	QUESTION	RESPONSE
1.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor in Council was taking place on February 14, 2022, regarding whether to issue a Proclamation Declaring that a Public Order Emergency exists throughout Canada, P.C. 2022-0106?	Subject to counsel's objection as outlined in Annex 1 my answer is: I did not give evidence or submissions to the Governor-in-Council (GIC) regarding whether to issue a Proclamation declaring the existence of a Public Order Emergency.
2.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor in Council was taking place on February 14, 2022, regarding whether to issue the Order-in-Council: Order directing Special Temporary Measures for Public Order Emergency, P.C. 2022-0106?	I did not.
3.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor in Council was taking place on February 15, 2022, regarding whether to issue the Order in Council: Emergency Measures Regulations,	I did not.
4.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor in Council was taking place on February 15, 2022, regarding whether to issue Order in Council: Emergency Measures Regulations, P.C. 2022-0107?	I did not.

No.	QUESTION	RESPONSE
5.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor in Council was taking place on February 15, 2022, regarding whether to issue the Order in Council: Emergency Economic Measures Order, P.C. 2022-0108?	Order in Council: Emergency Measures Regulations, P.C. 2022-0108 is not the correct number. The correct number is Order in Council: Emergency Measures Regulations, P.C. 2022-0107 (as stated in Q4).
6.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor in Council was taking place on February 15, 2022, regarding whether to issue the Order in Council: Emergency Economic Measures Order, P.C. 2022-0108?	I did not.
7.	You were not present before the Governor in Council when any of the hearings on February 14, 2022, and February 15, 2022, referred to in questions [1] through [6] herein took place?	I was not present during the decision-making process of the GIC.
8.	You have no knowledge of any of the evidence in your affidavit, including its exhibits, being before the Governor in Council when any of the hearings on February 14, 2022, and February 15, 2022, referred to in questions [1] through [6] herein took place?	I have no knowledge.
9.	You oversaw the creation of the template that the Royal Canadian Mounted Police (“RCMP”) used to provide the information to financial institutions that is exhibited at Exhibit “A” of your affidavit?	National Division was responsible for the collection of the information. They developed the template but I do not know who specifically developed it
10.	Regarding paragraph 36 of your affidavit, a filled in template and schedules at Exhibit “A” was completed regarding each of the Applicants Edward Cornell and Vincent Gircys?	Yes.
11.	Regarding paragraph 36 of your affidavit, the filled template and schedules referred to at question [10] herein was then provided to financial institutions by the RCMP?	Yes.

No.	QUESTION	RESPONSE
12.	Undertaking 1 of 10 – Will you undertake to provide true complete copies of the filled in template and schedules at Exhibit “A” regarding each of the Applicants Edward Cornell and Vincent Gircys that the RCMP provided to the financial institutions?	Please see the objection from counsel in Annex 1.
13.	What are the names of each of the specific financial institutions the RCMP provided the filled in template and schedules for the Applicants Edward Cornell and Vincent Gircys as referred to in question [10]?	I don’t know. This process was overseen by someone in my office. It started with major banks, and as the week went on, more financial institutions were added to the list, but I do not know all of the names.
14.	Regarding paragraph 36 of your affidavit, what are the names of each of the specific financial institutions the RCMP disclosed the names of the Applicants, Edward Cornell and Vincent Gircys, to?	As my answer for question 13, I don’t know.
15.	Regarding paragraph 36 of your affidavit, what date and time did the RCMP disclose the names of the Applicants, Edward Cornell and Vincent Gircys, to the financial institutions?	I don’t know the exact date and time.
16.	Regarding paragraph 36 of your affidavit, what date and time did the RCMP provide the filled in template and schedules for the Applicants Edward Cornell and Vincent Gircys as referred to in question [10] to the financial institutions?	I don’t know the date and time.
17.	Is it your understanding or belief that the legal basis the RCMP disclosed the names of the Applicants, Edward Cornell and Vincent Gircys to the financial institutions, was s.6 of the Emergency Economic Measures Order, P.C. 2022-0108?	In referring to the Order, yes, I can confirm that it was section 6, the section of the Order that allows the RCMP to share information with financial institutions.

No.	QUESTION	RESPONSE
18.	Is it your understanding or belief that the legal basis the RCMP disclosed to the financial institutions the filled in template and schedules regarding each of the Applicants, Edward Cornell and Vincent Gircys, as referred to in question [10], was s.6 of the Emergency Economic Measures Order, P.C. 2022-0108?	Yes, section 6.
19.	Does the RCMP have an investigation number or file number assigned to the investigations of the Applicants, Edward Cornell and Vincent Gircys, that lead to the filled in template and schedules referred to at question [9] herein being provided to the financial institutions?	I am not personally aware if an investigation number or a file number exists.
20.	Does the RCMP have an investigation number or file number assigned to the investigations of the Applicants, Edward Cornell and Vincent Gircys, that lead to the RCMP disclosing the names of the Applicants, Edward Cornell and Vincent Gircys to the financial institutions?	I am not personally aware of any investigation numbers or file numbers.
21.	Undertaking 2 of 10 - Will you undertake to provide true complete copies of the entire contents of the investigation files of the Applicants, Edward Cornell and Vincent Gircys, regarding any purported activity prohibited by sections 2 to 5 of the Emergency Measures Regulations P.C. 2022-0107?	Please see the objection from counsel in Annex 1.
22.	At paragraph 36 of your affidavit, you state that the Applicants, Edward Cornel and Vince Gircys overtly participated in “prohibited activities”?	Correct.
23.	You agree that the phrase “prohibited activities” used in your affidavit is a reference to the prohibitions listed in s.2 through 5 of the Emergency Measures Regulations, P.C. 2022-0107?	Yes.

No.	QUESTION	RESPONSE
24.	Since April 17, 2018, to present the head of the RCMP has been Commissioner Brenda Lucki?	I am not sure of the date, but the current head of the RCMP is Commissioner Brenda Lucki.
25.	Commissioner Brenda Lucki did not request or recommend to the Government of Canada that it invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I don't know.
26.	The Ottawa interim police chief Steve Bell did not request or recommend to the Government of Canada that it invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I don't know.
27.	You have no knowledge of Commissioner Brenda Lucki requesting or recommending to the Government of Canada that they invoke the <i>Emergencies Act</i> on or before February 14, 2022?	Correct, I have no knowledge.
28.	The RCMP did not request or recommend the Government of Canada invoke the <i>Emergencies Act</i> on or before February 14, 2022?	In terms of the RCMP as an organization, I don't know. I can only speak for myself, and I did not request it.
29.	You have no knowledge of the RCMP requesting or recommending to the Government of Canada that they invoke the <i>Emergencies Act</i> on or before February 14, 2022?	Correct, I have no knowledge.
30.	What are the total number of "entities" whose information the RCMP shared with service providers and financial institutions pursuant to s.6 of the Emergency Economic Measures Order, P.C. 2022-0108?	I believe there were 57 disclosures, composed of both individuals and businesses. I don't know the breakdown though of how many individuals and businesses were included in the disclosures. I may be provided with further information on this and will update my answer accordingly if I become aware of further detail.
31.	What are the total number of "individuals" (i.e. human beings) whose information the RCMP shared with service providers and financial institutions pursuant to s.6 of the	I am not certain of the exact number of individuals. I may be provided with further information on this and will update my

No.	QUESTION	RESPONSE
	Emergency Economic Measures Order, P.C. 2022-0108?	answer accordingly if I become aware of further detail.
32.	It is true that it was not the RCMP's request or recommendation to the Government of Canada that freezing bank accounts could be an effective measure to encourage protesters to leave Ottawa and elsewhere?	I do not know if the RCMP made this request.
33.	Is it true that "individuals" (.ie. human beings) whose information the RCMP shared with service providers and financial institutions pursuant to s.6 of the Emergency Economic Measures Order, P.C. 2022-0108, were only individuals involved in the protests in Ottawa?	Yes, just those involved at the protests in Ottawa.
34.	Is it true that none of the "individuals" (i.e. human beings) whose information the RCMP shared with service providers and financial institutions pursuant to s.6 of the Emergency Economic Measures Order, P.C. 2022-0108, were individuals involved in the protests and purported "blockades" outside Ottawa?	Yes, only those involved at the protests in Ottawa.
35.	Is it true that none of the "individuals" (i.e. human beings) whose information the RCMP shared with service providers and financial institutions pursuant to s.6 of the Emergency Economic Measures Order, P.C. 2022-0108, were protestors at the border in Coutts, Alberta?	Yes, that is true. Only those involved in Ottawa.
36.	On March 7, 2022, you stated that the sole purpose of using the Economic Measures in the Emergency Economic Measures Order, P.C. 2022-0108 was " <i>to clear the downtown area as peacefully as possible</i> ", correct?	Please see the objection from counsel in Annex 1.
37.	By downtown area you mean the downtown area of Ottawa?	Please see the objection from counsel in Annex 1.
38.	It is true that it is your understanding that the sole purpose of the Emergency Economic Measures Order, P.C. 2022-0108 was to clear	I can't speak on the purpose of why the law was created. I can speak on how the law was applied: to clear the downtown area as peacefully as possible, and to have a positive effect on the outcome. We didn't

No.	QUESTION	RESPONSE
	the downtown area of Ottawa as peacefully as possible?	know how the situation would be resolved, if there would be violence, or any other things that would get out of control. That is why we used every legal means to end the situation as peacefully as possible
39.	It is true that on March 7, 2022, you confirmed that you did not see any evidence of terrorist activity in the funding of the protests and purported “blockades”?	Please see the objection from counsel in Annex 1.
40.	It is true that you did not see any evidence of terrorist activity in the funding of the protests and purported “blockades”?	I did not see any evidence of terrorist activity in the funding. FINTRAC may be better suited to provide this information.
41.	On March 7, 2022, you stated of the Economic Measures under the Emergency Economic Measures Order, P.C. 2022-0108: <i>“We felt that it was a good measure to put in place. We can see it on a larger scale right now around the world, but restricting people’s financial assets certainly played a part in this”</i> . When you said <i>“We can see it on a larger scale right now around the world”</i> you were referring to economic sanctions, like those imposed on Russia, Russians, and Russian oligarchs arising from the Russian invasion of Ukraine, correct?	Please see the objection from counsel in Annex 1.
42.	It is true that that the Economic Measures under the Emergency Economic Measures Order, P.C. 2022-0108 are analogous to economic sanctions, like those imposed on Russia, Russians, and Russian oligarchs arising from the Russian invasion of Ukraine?	Please see the objection from counsel in Annex 1.
43.	Between February 15 and February 23, 2022, the Financial Transactions and Reports Analysis Centre of Canada (“FINTRAC”) worked closely with its partners, including the RCMP, to implement the Emergency Economic Measures Order, P.C. 2022-0108 and created a preregistration page for crowdfunding platforms and payment service	I cannot speak on the exact process that FINTRAC had created, I but confirm we worked with partners including FINTRAC. I cannot confirm the creation of a registration page.

No.	QUESTION	RESPONSE
	providers to register with FINTRAC and submit suspicious transaction reports?	
44.	You agree that FINTRAC's mandate is to facilitate the detection, prevention and deterrence of money laundering and the financing of terrorist activities while ensuring the protection of personal information under its control?	I am not certain if that is their exact mandate – FINTRAC's mandate is set out in its enabling legislation. However, my knowledge of FINTRAC is that their role is detecting and preventing money laundering and terrorism financing.
45.	A true copy of FINTRAC's website outlining the implementation of the Emergency Economic Measures Order printed on February 23, 2022, is attached hereto and marked as Exhibit "1" ?	This appears to be FINTRAC's website; however, I am not responsible for this webpage and cannot verify the authenticity or legitimacy of what has been produced.
46.	Exhibit 1 of 1 – Questioning [46] The Respondents agree that Exhibit "1" attached hereto can be treated as a full exhibit in the herein proceeding without further necessity of an affidavit being filed exhibiting same?	I am not prepared to agree to this request.
47.	Under s.5 of the Emergency Economic Measures Order, P.C. 2022-0108 entities set out in section 3 (i.e. service providers, banks etc.) must disclose without delay to the Commissioner of the Royal Canadian Mounted Police or to the Director of the Canadian Security Intelligence Service the existence of property in their possession or control that they have reason to believe is owned, held or controlled by or on behalf of a designated person, and any information about a transaction or proposed transaction in respect of said property. What is the number individuals (i.e. human beings) whose information was disclosed to the Commissioner of the Royal Canadian Mounted Police or to the Director of the Canadian Security Intelligence Service under s.5 of the Emergency Economic Measures Order, P.C. 2022-0108?	I don't know.
48.	What is the number of entities whose information was disclosed to the Commissioner of the Royal Canadian Mounted Police or to the Director of the	I don't know. There was a proactive disclosure made, but I am not certain of an exact number.

No.	QUESTION	RESPONSE
	Canadian Security Intelligence Service under s.5 of the Emergency Economic Measures Order, P.C. 2022-0108?	
49.	Was information from services providers and financial institutions regarding the Applicants Edward Cornell and Vincent Gircys disclosed under s.5 of the Emergency Economic Measures Order, P.C. 2022-0108 to the Commissioner of the Royal Canadian Mounted Police or to the Director of the Canadian Security Intelligence Service?	To the best of my knowledge, I can say yes for Mr. Gircys and no for Mr. Cornell. I did not personally receive all of the emails that came in from the banks.
50.	Undertaking 3 of 10 – Can you undertake to produce the information from services providers and financial institutions regarding the Applicants Edward Cornell and Vincent Gircys that was disclosed under s.5 of the Emergency Economic Measures Order, SOR/2022-22 to the Commissioner of the Royal Canadian Mounted Police or to the Director of the Canadian Security Intelligence Service?	Please see the objection from counsel in Annex 1.
51.	There is evidence in this proceeding that the Incident Respondent Group had three meetings, one on each of February 10, 12 and 13, 2022. Were you a member, participant, or attendee at any of the Incident Respondent Group meetings on February 10, 12 and 13, 2022?	No.
52.	Undertaking 4 of 10 – Can you undertake to produce a true copy of the mandate of the Incident Response Group referred to in your affidavit?	Please see the objection from counsel in Annex 1.
53.	Undertaking 5 of 10 – Can you undertake to produce true copies of all minutes, notes, and records before and created by the members and attendees of the Incident Response Group meetings on February 10, 12 and 13, 2022 referred to in your affidavit?	Please see the objection from counsel in Annex 1.
54.	You are aware the Clerk of the Pricy Council has issued a certificate under s.39 of the	No.

No.	QUESTION	RESPONSE
	Canada Evidence Act regarding the record before the Governor in Council?	
55.	You can agree the certificate under s.39 of the Canada Evidence Act regarding the record before the Governor in Council lists the records it is issued in relation to?	I have not seen the certificate.
56.	Undertaking 6 of 10 – Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council directing that a Proclamation be issued pursuant to subsection 17(1) of the <i>Emergencies Act</i> ?	Please see the objection from counsel in Annex 1.
57.	Undertaking 7 of 10 – Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to subsection 19(1) of the <i>Emergencies Act</i> and concerning Emergency Measures Regulations?	Please see the objection from counsel in Annex 1.
58.	Undertaking 8 of 10 – Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to subsection 19(1) of the <i>Emergencies Act</i> and concerning an Emergency Economic Measures Order?	Please see the objection from counsel in Annex 1.
59.	You have no knowledge of any other records being before the Governor in Council in this matter other than those listed in the certificate issued by the Clerk of the Privy Council under s.39 of the <i>Canada Evidence Act</i> ?	No, I am not aware.

No.	QUESTION	RESPONSE
60.	Undertaking 9 of 10 – If there are records that were before the Governor in Council in this matter other than those listed in the certificate issued by the Clerk of the Privy Council under s.39 of the <i>Canada Evidence Act</i> , can you undertake to produce them?	Please see the objection from counsel in Annex 1.
61.	As a senior member of the RCMP your familiar with protests and blockades set up throughout Canada that have occurred from 1990 to present?	Subject to the objection of the AGC in Annex 1, my answer is that I have some general awareness, but no professional experience or first-hand knowledge with these other events.
62.	You're familiar with the protest and blockade that occurred in 1990 in Oka, Quebec?	Please see the objection from counsel in Annex 1.
63.	Can you agree with the description of the protest and blockade in 1990 in Oka, Quebec as taken from a third party source: An armed standoff in Oka between Mohawks and the Canadian army ended on Sept. 26, 1990, after 11 weeks. The conflict partly stemmed from the town of Oka's plan to expand a golf course on land the Mohawks claimed. After a failed July 11 police raid in which an officer was killed, Mohawks at the Kahnawake reserve south of Montreal blocked the Mercier Bridge that connects Montreal to its populous south-shore suburbs in a show of support. Trouble later erupted near the Kahnawake reserve shortly after the events at Oka, when a crowd of 400 to 500 bat-toting and rock-launching Mohawk protesters threatened soldiers. By the end, army officials had taken 34 men, 16 women and six young people into custody. In the aftermath of the standoff, Ottawa appointed a royal commission on Aboriginal issues.	Please see the objection from counsel in Annex 1.
64.	You're familiar with the protest and blockade that occurred in 1993 in Clayoquot Sound, British Columbia?	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
65.	Can you agree with the following description of the protest and blockade in 1993 in Clayoquot Sound, British Columbia as taken from a third party source: More than 700 people were arrested in 1993 during a peaceful three-month anti-logging protest on Vancouver Island. They objected to the B.C. government's logging plan for the Clayoquot, which would have allowed some form of logging in two-thirds of the 350,000 hectares of forest, home to some of Canada's largest and oldest trees. On July 15, police estimated nearly 2,000 people attended a rally in Tofino to hear the Australian rock group Midnight Oil perform in support of the protesters. The band's visit was organized by Greenpeace Canada. In 1995, the B.C. government said clearcutting — when large tracts of forest are stripped of trees — would be replaced with a new form of harvesting that requires loggers to leave more trees standing	Please see the objection from counsel in Annex 1.
66.	You're familiar with the protest or blockade that occurred in 1995 in Ipperwash, Ontario?	Please see the objection from counsel in Annex 1.
67.	Can you agree with the following description of the protest or blockade in 1995 in Ipperwash, Ontario as taken from a third party source: One man was killed during a standoff over a land claim by Chippewa protesters outside Ipperwash Provincial Park on Lake Huron near London, Ont., in September 1995. Dudley George was killed in a confrontation with police at the park on Sept. 6. The land claim dated back more than 50 years and involved an abandoned military base. Nearly three weeks after the shooting, hundreds of people occupied the base and dozens more refused to leave the park, saying it was the site of a sacred burial ground. A police officer was later convicted of criminal negligence causing death. The standoff by	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
	members of the Kettle and Stoney Point First Nation ended on Sept. 13.	
68.	You are familiar with the protest and blockade that occurred in 2013 in Rexton, New Brunswick?	Please see the objection from counsel in Annex 1.
69.	Can you agree with the following description of the protest and blockade in 2013 in Rexton, New Brunswick as taken from a third party source: Forty people were arrested after RCMP enforced an injunction on Oct. 17, 2013, to prevent people from blocking a compound near Rexton where SWN Resources was storing exploration equipment. Police said they seized guns and improvised explosive devices when they enforced the injunction to end the blockade of the compound. Six police vehicles were burned and police responded with pepper spray and fired beanbag-type bullets to defuse the situation. Among those who opposed shale gas development was the Elsipogtog First Nation. The RCMP blocked Route 134 on Sept. 29 after a protest there began spilling onto the road. Protesters subsequently cut down trees that were placed across another part of the road, blocking the entrance to the compound. The protesters wanted SWN Resources to stop seismic testing and leave the province. In 2014, the Liberal government in New Brunswick brought in an indefinite moratorium on hydraulic fracturing. It also instituted five conditions on allowing fracking, which included a plan for regulations and waste-water disposal, a process for consultation with First Nations, a royalty structure and a so-called social licence.	Please see the objection from counsel in Annex 1.
70.	You're familiar with the protest and blockade in 2020 commonly referred to as the "Canadian pipeline and railway protests"?	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
71.	Someone online has taken the time to make a full timeline of the 2020 “Canadian pipeline and railway protests” in Wikipedia with references, can you agree that the following description and timelines of the 2020 “Canadian pipeline and railway protests from January 5, 2020 to March 21, 2020 is accurate : January 2020 January 5 - Anarchist website North Shore Counter Info releases a callout against rail infrastructure: "To Settlers, by Settlers" which includes instructions and tips for sabotage in solidarity with the Wet'suwet'en. January 7 - The UN Committee on the Elimination of Racial Discrimination calls on Canada to immediately stop the construction of the Coastal GasLink (CGL) and Trans Mountain pipelines and the Site C dam. January 7 - Individuals sabotage three junctions in Hamilton, Ontario shutting down all rail traffic in and out of the city. January 8 - Protestors in Hamilton, Ontario block a main road and rail crossing in solidarity with the Wet'suwet'en. January 11 - BC Human Rights Commissioner Kasari Govender calls for a halt to the CGL pipeline until the affected Indigenous groups consent to the construction. January 16 - UN committee chair Nouredine Amir admits to media that he was unaware that the CGL had broad Indigenous backing other than the Wet'suwet'en. January 16 - Karen Ogen-Toews, chair of the First Nations LNG Alliance and former Wet'suwet'en elected chief, writes an open letter to the UN asking for a retraction and immediate apology to the 20 First Nations who are in favour of the project. January 20 – Protesters disrupt BC ferry service leaving from Swartz Bay ferry	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
	terminal, which is Victoria's main ferry link to the BC mainland. January 23 - Individuals sabotage a rail junction box in Burlington, ON. January 27 - BC Minister of Public Safety and Solicitor General Mike Farnworth declares a provincial emergency under the Provincial Police Service Agreement and authorizes the Royal Canadian Mounted Police (RCMP) to redeploy resources to use in the enforcement of the injunction in a letter to the RCMP Deputy Commissioner. January 30 – The RCMP announces that they would stand down while the hereditary chiefs and the province meet to discuss and try to come to an agreement. February 2020 February 1 - The Office of the Hereditary Chiefs of the Wet'suwet'en give an "eviction notice" to the Coastal GasLink Pipeline construction camp February 3 – The Office of the Wet'suwet'en asks for a judicial review of the environmental approval for the pipeline. February 4 – The hereditary chiefs and the Government of British Columbia issue statements that talks had broken down. February 6 – The RCMP begins enforcing the injunction, arresting 21 persons at camps along the route between February 6 and 9. February 6 – Near Belleville, Ontario, members of the Mohawks of the Bay of Quinte First Nation begin a blockade of the Canadian National Railway rail line just north of Tyendinaga Mohawk Territory. The line is critical to the CNR network in Eastern Canada as CNR has no other east–west rail lines through Eastern Ontario. February 6 – Via Rail cancels trains on their Toronto–Montreal and Toronto–Ottawa routes. Until February 13, Via Rail	

No.	QUESTION	RESPONSE
	announces passenger train cancellations on a day-to-day basis. February 8 – Solidarity protests take place in Toronto and Ottawa. February 8 - A blockade of the Exo's Cadiac line south of Montreal in Kahnawake begins. February 9-10 - Individuals set fire to a rail junction box in Hamilton, ON and Guelph, ON. February 10 – Solidarity rallies take place in Nelson, Calgary, Regina, Winnipeg, Sherbrooke, and Halifax. February 10 – Metro Vancouver police arrest 47 persons blocking the Port of Vancouver, Deltaport, and two other ports in Metro Vancouver. February 10 – A blockade goes up on the CNR line west of Winnipeg blocking the trans-Canada passenger rail route. February 10 – The Société de chemin de fer de la Gaspésie (SCFG) freight railway between Gaspé and Matapédia, Quebec is blockaded by members of the Listuguj Mi'gmaq First Nation. February 11 – Prince George–Prince Rupert passenger rail service is suspended. February 11 – The RCMP announces that the road to the construction site was cleared and TC Energy announced that work would resume the following Monday. February 11 – A solidarity rally surrounds the BC Legislature in Victoria, preventing the traditional ceremonies around the reading of the Throne Speech by the Lieutenant Governor. Members of the Legislature had to have police assistance to enter or used back or side entrances. February 12 - The Wet'suwet'en hereditary chiefs petition the Supreme Court of Canada to declare "Canada has a constitutional duty	

No.	QUESTION	RESPONSE
	to keep the country's greenhouse gas emissions within the Paris Agreement limit." February 13 – CNR shuts down its rail lines east of Toronto. February 13 – Via Rail announces the shutdown of its entire network, with the exception of the Sudbury–White River train line and the Winnipeg–Churchill train between Churchill and The Pas, until further notice. February 14 – BC Ferries obtains a preemptive injunction to prevent anticipated future demonstrations from blocking Vancouver-Victoria ferry service. February 15 – The rail blockade of Prince Rupert is lifted. February 15 - Over 200 people block Macmillan Yard - the second largest railyard in Canada - in solidarity. February 15 – Indigenous Services Minister Marc Miller meets the Mohawks in a ceremonial encounter on the CNR train tracks to renew a 17th Century treaty between the Iroquois and the British Crown known as the Silver Covenant Chain. Miller and the leaders of Tyendinaga then discussed the blockade. Miller asked for a temporary drawback of the protest but his request was refused after Wet'suwet'en hereditary Chief Woos, who was on the phone, stated that the RCMP was still on his territory and "they are out there with guns, threatening us." Leaked audio of the meetings included a Mohawk resident in the meeting telling the minister to "Get the red coats out first, get the blue coats out ... then we can maybe have some common discussions". February 16 – A demonstration temporarily blocks the Rainbow Bridge border crossing in Niagara Falls, Ontario.	

No.	QUESTION	RESPONSE
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	February 20 – The RCMP offers to close its Community Industry Security Office (CISO) on the Morice Road. February 20 – Another blockade of CPR tracks springs between Kamloops and Chase in British Columbia. The protesters left voluntarily on February 21, after the RCMP offered to leave the Wet'suwet'en land. The group vowed to return in four days if a dialogue was not started between the prime minister and the hereditary chiefs. February 20 - The Civilian Review and Complaints Commission (CRCC) for the RCMP issues a letter critical of RCMP procedures in the "checkpoint and exclusion zone" implemented on the Morice West Forest Service Road, stating the RCMP went beyond its legal authority to do ID checks of activists and searches of activists' vehicles. February 20 - Wetsuweten hereditary matriarch Rita George speaks out against the protests, saying they were not supported by the matriarchs and that the protesters are not following ancestral ways. February 21 – The Mont-Saint-Hilaire rail line is cleared after the Sûreté du Québec police arrive to enforce a CNR injunction February 21 – Prime Minister Trudeau calls for the barricades to come down. February 21 – The British Columbia Environmental Assessment Office (EAO) served notice that Coastal GasLink must halt construction on that segment and enter into talks with the Wet'suwet'en over the next 30 days. February 21 – Wet'suwet'en supporters block CNR rail lines near Moncton, New Brunswick. February 22 – After the hereditary chiefs made it a condition for talks with the federal government, the RCMP closes their CISO	

No.	QUESTION	RESPONSE
	onsite office and moves to their detachment in Houston. February 22 - Anarchists in Hamilton, ON release a statement promising to blockade rails if the OPP clear the Tyendinaga blockade. February 23 – Mohawks at the Tyendinaga rail blockade are given notice by the OPP to clear their blockade by midnight to avoid prosecution for disobeying the injunction against the blockade. February 24 – The Tyendinaga Mohawks do not vacate the site. The OPP removes the blockade, arresting several of the protesters. February 24 – Immediately following the police action, new protests spring up in the province of Quebec, including a temporary rolling blockade of the Honoré Mercier Bridge near Montreal by Mohawks from Kahnawake, a new rail blockade by the Listuguj Mi'gmaq in the Gaspé Peninsula, and a barricade of Route 344 which was the site of the 1990 Oka Crisis. February 24 – Rail blockades come down in New Brunswick after being served with an injunction. February 24 – New protests form in British Columbia, blocking the BC Legislature, the Port of Vancouver and rail lines in Hazelton and Kamloops. In Hazelton, 14 protesters, including three Gitksan hereditary chiefs, are arrested. They are released overnight. February 24 - In a statement signed and supported by over 200 Canadian lawyers, Beverly Jacobs and Sylvia McAdam of the University of Windsor, Alex Neve of Amnesty International, and Harsha Walia of the BC Civil Liberties Association state that is the Canadian governments that are breaking international law, not the Wetsuweten hereditary chiefs and call for an end to the violation of indigenous persons' right to free, prior and informed consent.	

No.	QUESTION	RESPONSE
	February 24 – Members of the Mohawk Nation (Bear Clan) from the Six Nations of the Grand River First Nation block Ontario Highway 6 in Caledonia in solidarity with the Wet'suwet'en. February 25 – Members of the Six Nations of the Grand River First Nation set up a rail blockade in Hamilton, causing the cancellation of train service between Aldershot and Niagara Falls stations. The GO Metrolinx agency replaced the rail service with shuttle buses. February 25 - A demonstration blocks commuter rail lines in Toronto, causing suspension of GO train service for several hours. Several protesters are arrested. February 25 - In Kanesatake, the blockade is reduced on Highway 344, allowing only a single lane of traffic through the territory. February 25 - Polling firm Ipsos releases a poll indicating that 63% of Canadians support the "intervention by police to end the blocking of key transportation corridors", while only 26% oppose police action. Additionally, 60% of Canadians are against the blockades, while 27% are in favour. February 26 - A meeting between Wet'suwet'en hereditary chiefs and the BC and federal governments is cancelled, then rescheduled for February 27. February 27 - A few dozen activists, protesting the pipeline and the OPP actions, block rail lines in Kingston, Ontario for several hours. February 27 - TC Energy agrees to pause construction and the RCMP stops patrolling the Morice Forest Service Road to address the Wet'suwet'en hereditary chiefs' preconditions for talks with government ministers. February 27 - Canadian Crown-Indigenous Relations and Northern Development Minister Carolyn Bennett and B.C.	

No.	QUESTION	RESPONSE
	Indigenous Relations Minister Scott Fraser arrive in Smithers, British Columbia begin two days of talks with the Wet'suwet'en hereditary chiefs. February 28 - Wet'suwet'en matriarchs join the meetings, demanding representation from all of the Wet'suwet'en people. March 2020 March 1 - After extending talks to three days, an agreement on land rights is reached, in the form of a Memorandum of Understanding (MOU). It is to be presented to the Wet'suwet'en Nation for ratification. March 2 - RCMP patrols resume and CGL construction work resumes. March 2 - A CNR rail bridge in Pointe-St-Charles, Quebec is blocked for several hours by protesters, who leave peacefully. March 3 - Via Rail resumes service on their Toronto-Montreal and Toronto-Ottawa lines. March 3 - CNR recalls the 450 workers it had temporarily laid off on February 18. March 3 - A meeting is held at the Centennial Hall in Witset among the Laksilyu (Small Frog Clan), to discuss the tentative agreement reached between the hereditary chiefs and the representatives of the Canadian government. The meeting's attendees agree to the proposal on the spot. March 4 - University students at several universities across Canada walkout and hold protests in support of the Wet'suwet'en. March 4 - The Canadian, Via Rail's Toronto-Vancouver train, resumes partial service, as Via announces it is recalling most of the 1,000 employees "affected by temporary suspensions" starting on February 19. March 5 - The Mohawks of Kahnawake and the Listiguj First Nation dismantle their rail blockades in Quebec.	

No.	QUESTION	RESPONSE
	March 5 - Five indigenous youth from the protest at the B.C. Legislature (which had begun February 11) are arrested, and the protest is dismantled. March 6 - The BC Civil Liberties Association and the Wet'suwet'en release a letter written by BC Minister Farnworth authorizing a redeployment of RCMP resources to support the injunction enforcement. In the BCCLA's opinion, the letter contradicts his later statement that the government does not direct the RCMP's activities. March 7 - Via Rail service has resumed on most routes, after disruption to more than 1,070 trips and roughly 165,000 passengers, according to Via Rail. Via Rail subsequently suspends The Canadian and Ocean services and reduces the frequency on the Winnipeg-Churchill route due to the COVID-19 pandemic, some time after the reinstatement announcement is made. March 8 - The Tsayu (Beaver Clan) hold a meeting at the Centennial Hall in Witset to discuss the tentative agreement reached on March 1. March 10 - Speaking about the blockade on Highway 6 near Six Nations of the Grand River (begun February 24), Haldimand—Norfolk MPP Toby Barrett calls on anyone who can help to "tear down this blockade", citing the fact that businesses in the area are suffering. March 13 - Canada's Parliamentary Budget Officer Yves Giroux releases a report stating that the protests would have very little impact on economic growth, estimating that the impact would amount to a 0.01% fall in GDP, which he characterized as "a blip", and saying earlier warnings of shortages and economic downturn by corporations was "overblown". March 17 - The planned Wet'suwet'en all-clans meeting is postponed indefinitely amid a variety of concerns, including the COVID-	

No.	QUESTION	RESPONSE
	19 pandemic and a death in the community (unrelated to COVID-19). March 19 - The blockade on Highway 6 near Six Nations of the Grand River is removed after protesters and Six Nations chief Mark Hill come together and decide to leave the road and move back to Douglas Creek estates, known in the Mohawk language as Kanonhstaton "the protected place", a site which had been a focal point for the long-standing Grand River land dispute. In a statement issued by the protesters, they say their departure is done "as a sign of good faith". March 20 - The OPP West Region says they are working with the Ministry of Transportation of Ontario (MTO) to remove concrete barriers they had set up around the protest. March 21 - The OPP West Region tweets that Highway 6 is expected to re-open over the (March 21–22) weekend.	
72.	You are aware of the February 17, 2022 attack on Coastal GasLink (CGL) and its employees?	Please see the objection from counsel in Annex 1.
73.	Can you agree with the following description of February 17, 2022 attack on Coastal GasLink (CGL) from a third party source which references RCMP statements: Violence has erupted at a Coastal GasLink pipeline work site in Northern B.C., leaving workers shaken and millions of dollars in damage. Very early Thursday, just after midnight, Coastal GasLink security called RCMP for help, reporting it was under attack by about 20 people, some wielding axes. RCMP Chief Supt. Warren Brown, commander for the north district, called the attack a “calculated and organized violent	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
	attack that left its victims shaken and a multi-million dollar path of destruction.” Coastal GasLink said in a statement the attackers surrounded some of its workers in a “highly planned” and “unprovoked” assault near the Morice River drill pad site off the forest service road. “In one of the most concerning acts, an attempt was made to set a vehicle on fire while workers were inside,” said the company in a statement. “The attackers also wielded axes, swinging them at vehicles and through a truck’s window. Flare guns were also fired at workers.” The company said its workers fled. They were shaken, but no one was physically injured. Coastal GasLink said attackers used grinders to cut locks on a gate, entering an active construction site. They damaged heavy equipment and construction trailers, causing millions of dollars in damage. More precise estimates were not yet available. The attackers also cut equipment hydraulic and fuel lines, causing dangerous leaks. The company said it was working to contain the environmental impact. Photos provided by RCMP showed the extent of the damage to the company’s and contractors’ equipment and property. At least two heavy excavators were toppled on to their sides, trucks were badly damaged and a portable office showed extensive damage to the exterior, with parts of its facade torn down. At the drill pad site, about 12 kilometres further down the road, officers documented damage to heavy machinery, fencing and portables.	
74.	It’s understood that the RCMP created a document in 2021 regarding the status of the Canadian pipeline and railway protests titled	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
	<u>“Royal Canadian Mounted Police Situation Report”</u> that was authored and provided department heads of Indigenous Services Canada and Crown-Indigenous Relations prior to an October 19, 2021 meeting between them and Commissioner Brendan Lucki of the RCMP. The RCMP would have completed such “situation reports” or like reports with a different title regarding the protests and purported blockades in Ottawa and throughout Canada between January 27, 2022 and February 14, 2022?	
75.	Undertaking 10 of 10 – Will you undertake to produce all or any of the “situation reports” or like reports with a different title regarding the protests and purported blockades in Ottawa and throughout Canada between January 27, 2022, and February 14, 2022 that were authored or issued by the RCMP prior to the invocation of the Emergencies Act on February 14, 2022?	Please see the objection from counsel in Annex 1.

FEDERAL COURT

B E T W E E N :

**JEREMIAH JOST, EDWARD CORNELL, VINCENT GIRCYS,
and HAROLD RISTAU**

Applicants

- and -

**GOVERNOR IN COUNCIL, HER MAJESTY IN RIGHT OF CANADA, ATTORNEY GENERAL
OF CANADA, and MINISTER OF PUBLIC SAFETY AND EMERGENCY PREPAREDNESS**

Respondents

**OBJECTIONS TO WRITTEN EXAMINATION QUESTIONS
OF DENIS BEAUDOIN
AFFIDAVIT SWORN APRIL 4, 2022**

No.	QUESTION	OBJECTION
1.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor in Council was taking place on February 14, 2022, regarding whether to issue a Proclamation Declaring that a Public Order Emergency exists throughout Canada, P.C. 2022-0106?	The AGC objects to the question as well as the ones following (questions 2-8) in so far as they incorrectly characterize the decision-making process of the GIC in this matter as a “hearing”. The GIC decision-making process is a private and confidential one. The GIC does not hold hearings.
12.	Undertaking 1 of 10 – Will you undertake to provide true complete copies of the filled in template and schedules at Exhibit “A” regarding each of the Applicants Edward Cornell and Vincent Gircys that the RCMP provided to the financial institutions?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.
21.	Undertaking 2 of 10 - Will you undertake to provide true complete copies of the entire contents of the investigation files of the Applicants, Edward Cornell and Vincent Gircys, regarding any purported activity prohibited by sections 2 to 5 of the	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.

No.	QUESTION	OBJECTION
	Emergency Measures Regulations P.C. 2022-0107?	
36.	On March 7, 2022, you stated that the sole purpose of using the Economic Measures in the Emergency Economic Measures Order, P.C. 2022-0108 was <i>“to clear the downtown area as peacefully as possible”</i> , correct?	This question, like all of those where this objection is given, pertains to evidence Supt Beaudoin provided before a Parliamentary committee. Objection on the grounds of Parliamentary privilege.
37.	By downtown area you mean the downtown area of Ottawa?	Parliamentary privilege.
39.	It is true that on March 7, 2022, you confirmed that you did not see any evidence of terrorist activity in the funding of the protests and purported “blockades”?	Parliamentary privilege.
41.	On March 7, 2022, you stated of the Economic Measures under the Emergency Economic Measures Order, P.C. 2022-0108: <i>“We felt that it was a good measure to put in place. We can see it on a larger scale right now around the world, but restricting people's financial assets certainly played a part in this”</i> . When you said <i>“We can see it on a larger scale right now around the world”</i> you were referring to economic sanctions, like those imposed on Russia, Russians, and Russian oligarchs arising from the Russian invasion of Ukraine, correct?	Parliamentary privilege.
42.	It is true that that the Economic Measures under the Emergency Economic Measures Order, P.C. 2022-0108 are analogous to economic sanctions, like those imposed on Russia, Russians, and Russian oligarchs arising from the Russian invasion of Ukraine?	Calls for irrelevant opinion.
50.	Undertaking 3 of 10 – Can you undertake to produce the information from services providers and financial institutions regarding the Applicants Edward Cornell and Vincent Gircys that was disclosed under s.5 of the Emergency Economic Measures Order, SOR/2022-22 to the Commissioner	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.

No.	QUESTION	OBJECTION
	of the Royal Canadian Mounted Police or to the Director of the Canadian Security Intelligence Service?	
52.	Undertaking 4 of 10 – Can you undertake to produce a true copy of the mandate of the Incident Response Group referred to in your affidavit?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.
53.	Undertaking 5 of 10 – Can you undertake to produce true copies of all minutes, notes, and records before and created by the members and attendees of the Incident Response Group meetings on February 10, 12 and 13, 2022 referred to in your affidavit?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.
56.	Undertaking 6 of 10 – Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council directing that a Proclamation be issued pursuant to subsection 17(1) of the <i>Emergencies Act</i> ?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.
57.	Undertaking 7 of 10 – Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to subsection 19(1) of the <i>Emergencies Act</i> and concerning Emergency Measures Regulations?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.
58.	Undertaking 8 of 10 – Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.

No.	QUESTION	OBJECTION
	subsection 19(1) of the <i>Emergencies Act</i> and concerning an Emergency Economic Measures Order?	
60.	Undertaking 9 of 10 – If there are records that were before the Governor in Council in this matter other than those listed in the certificate issued by the Clerk of the Privy Council under s.39 of the <i>Canada Evidence Act</i> , can you undertake to produce them?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.
61.	As a senior member of the RCMP your familiar with protests and blockades set up throughout Canada that have occurred from 1990 to present?	The AGC objects to Questions 61 – 74 as irrelevant.
62.	You're familiar with the protest and blockade that occurred in 1990 in Oka, Quebec?	Not relevant.
63.	Can you agree with the description of the protest and blockade in 1990 in Oka, Quebec as taken from a third party source: An armed standoff in Oka between Mohawks and the Canadian army ended on Sept. 26, 1990, after 11 weeks. The conflict partly stemmed from the town of Oka's plan to expand a golf course on land the Mohawks claimed. After a failed July 11 police raid in which an officer was killed, Mohawks at the Kahnawake reserve south of Montreal blocked the Mercier Bridge that connects Montreal to its populous south-shore suburbs in a show of support. Trouble later erupted near the Kahnawake reserve shortly after the events at Oka, when a crowd of 400 to 500 bat-toting and rock-launching Mohawk protesters threatened soldiers. By the end, army officials had taken 34 men, 16 women and six young people into custody. In the aftermath of the standoff, Ottawa appointed a royal commission on Aboriginal issues.	Not relevant.

No.	QUESTION	OBJECTION
64.	You're familiar with the protest and blockade that occurred in 1993 in Clayoquot Sound, British Columbia?	Not relevant.
65.	Can you agree with the following description of the protest and blockade in 1993 in Clayoquot Sound, British Columbia as taken from a third party source: More than 700 people were arrested in 1993 during a peaceful three-month anti-logging protest on Vancouver Island. They objected to the B.C. government's logging plan for the Clayoquot, which would have allowed some form of logging in two-thirds of the 350,000 hectares of forest, home to some of Canada's largest and oldest trees. On July 15, police estimated nearly 2,000 people attended a rally in Tofino to hear the Australian rock group Midnight Oil perform in support of the protesters. The band's visit was organized by Greenpeace Canada. In 1995, the B.C. government said clearcutting — when large tracts of forest are stripped of trees — would be replaced with a new form of harvesting that requires loggers to leave more trees standing.	Not relevant.
66.	You're familiar with the protest or blockade that occurred in 1995 in Ipperwash, Ontario?	Not relevant.
67.	Can you agree with the following description of the protest or blockade in 1995 in Ipperwash, Ontario as taken from a third party source: One man was killed during a standoff over a land claim by Chippewa protesters outside Ipperwash Provincial Park on Lake Huron near London, Ont., in September 1995. Dudley George was killed in a confrontation with police at the park on Sept. 6. The land claim dated back more than 50 years and involved an abandoned military base. Nearly three weeks after the shooting, hundreds of people occupied the base and	Not relevant.

No.	QUESTION	OBJECTION
	dozens more refused to leave the park, saying it was the site of a sacred burial ground. A police officer was later convicted of criminal negligence causing death. The standoff by members of the Kettle and Stoney Point First Nation ended on Sept. 13.	
68.	You are familiar with the protest and blockade that occurred in 2013 in Rexton, New Brunswick?	Not relevant.
69.	Can you agree with the following description of the protest and blockade in 2013 in Rexton, New Brunswick as taken from a third party source: Forty people were arrested after RCMP enforced an injunction on Oct. 17, 2013, to prevent people from blocking a compound near Rexton where SWN Resources was storing exploration equipment. Police said they seized guns and improvised explosive devices when they enforced the injunction to end the blockade of the compound. Six police vehicles were burned and police responded with pepper spray and fired beanbag-type bullets to defuse the situation. Among those who opposed shale gas development was the Elsipogtog First Nation. The RCMP blocked Route 134 on Sept. 29 after a protest there began spilling onto the road. Protesters subsequently cut down trees that were placed across another part of the road, blocking the entrance to the compound. The protesters wanted SWN Resources to stop seismic testing and leave the province. In 2014, the Liberal government in New Brunswick brought in an indefinite moratorium on hydraulic fracturing. It also instituted five conditions on allowing fracking, which included a plan for regulations and waste-water disposal, a process for consultation with First Nations,	Not relevant.

No.	QUESTION	OBJECTION
	a royalty structure and a so-called social licence.	
70.	You're familiar with the protest and blockade in 2020 commonly referred to as the "Canadian pipeline and railway protests"?	Not relevant.
71.	Someone online has taken the time to make a full timely of the 2020 "Canadian pipeline and railway protests" in Wikipedia with references, can you agree that the following description and timelines of the 2020 "Canadian pipeline and railway protests from January 5, 2020 to March 21, 2020 is accurate : January 2020 January 5 - Anarchist website North Shore Counter Info releases a callout against rail infrastructure: "To Settlers, by Settlers" which includes instructions and tips for sabotage in solidarity with the Wet'suwet'en. January 7 - The UN Committee on the Elimination of Racial Discrimination calls on Canada to immediately stop the construction of the Coastal GasLink (CGL) and Trans Mountain pipelines and the Site C dam. January 7 - Individuals sabotage three junctions in Hamilton, Ontario shutting down all rail traffic in and out of the city. January 8 - Protestors in Hamilton, Ontario block a main road and rail crossing in solidarity with the Wet'suwet'en. January 11 - BC Human Rights Commissioner Kasari Govender calls for a halt to the CGL pipeline until the affected Indigenous groups consent to the construction. January 16 - UN committee chair Nouredine Amir admits to media that he was unaware that the CGL had broad	Not relevant.

No.	QUESTION	OBJECTION
	Indigenous backing other than the Wet'suwet'en. January 16 - Karen Ogen-Toews, chair of the First Nations LNG Alliance and former Wet'suwet'en elected chief, writes an open letter to the UN asking for a retraction and immediate apology to the 20 First Nations who are in favour of the project. January 20 – Protesters disrupt BC ferry service leaving from Swartz Bay ferry terminal, which is Victoria's main ferry link to the BC mainland. January 23 - Individuals sabotage a rail junction box in Burlington, ON. January 27 - BC Minister of Public Safety and Solicitor General Mike Farnworth declares a provincial emergency under the Provincial Police Service Agreement and authorizes the Royal Canadian Mounted Police (RCMP) to redeploy resources to use in the enforcement of the injunction in a letter to the RCMP Deputy Commissioner. January 30 – The RCMP announces that they would stand down while the hereditary chiefs and the province meet to discuss and try to come to an agreement. February 2020 February 1 - The Office of the Hereditary Chiefs of the Wet'suwet'en give an "eviction notice" to the Coastal GasLink Pipeline construction camp February 3 – The Office of the Wet'suwet'en asks for a judicial review of the environmental approval for the pipeline. February 4 – The hereditary chiefs and the Government of British Columbia issue statements that talks had broken down. February 6 – The RCMP begins enforcing the injunction, arresting 21 persons at camps along the route between February 6 and 9.	

No.	QUESTION	OBJECTION
	February 6 – Near Belleville, Ontario, members of the Mohawks of the Bay of Quinte First Nation begin a blockade of the Canadian National Railway rail line just north of Tyendinaga Mohawk Territory. The line is critical to the CNR network in Eastern Canada as CNR has no other east–west rail lines through Eastern Ontario. February 6 – Via Rail cancels trains on their Toronto–Montreal and Toronto–Ottawa routes. Until February 13, Via Rail announces passenger train cancellations on a day-to-day basis. February 8 – Solidarity protests take place in Toronto and Ottawa. February 8 - A blockade of the Exo's Candiac line south of Montreal in Kahnawake begins. February 9-10 - Individuals set fire to a rail junction box in Hamilton, ON and Guelph, ON. February 10 – Solidarity rallies take place in Nelson, Calgary, Regina, Winnipeg, Sherbrooke, and Halifax. February 10 – Metro Vancouver police arrest 47 persons blocking the Port of Vancouver, Deltaport, and two other ports in Metro Vancouver. February 10 – A blockade goes up on the CNR line west of Winnipeg blocking the trans-Canada passenger rail route. February 10 – The Société de chemin de fer de la Gaspésie (SCFG) freight railway between Gaspé and Matapédia, Quebec is blockaded by members of the Listuguj Mi'gmaq First Nation. February 11 – Prince George–Prince Rupert passenger rail service is suspended. February 11 – The RCMP announces that the road to the construction site was cleared	

No.	QUESTION	OBJECTION
	and TC Energy announced that work would resume the following Monday. February 11 – A solidarity rally surrounds the BC Legislature in Victoria, preventing the traditional ceremonies around the reading of the Throne Speech by the Lieutenant Governor. Members of the Legislature had to have police assistance to enter or used back or side entrances. February 12 - The Wet'suwet'en hereditary chiefs petition the Supreme Court of Canada to declare "Canada has a constitutional duty to keep the country's greenhouse gas emissions within the Paris Agreement limit." February 13 – CNR shuts down its rail lines east of Toronto. February 13 – Via Rail announces the shutdown of its entire network, with the exception of the Sudbury–White River train line and the Winnipeg–Churchill train between Churchill and The Pas, until further notice. February 14 – BC Ferries obtains a preemptive injunction to prevent anticipated future demonstrations from blocking Vancouver-Victoria ferry service. February 15 – The rail blockade of Prince Rupert is lifted. February 15 - Over 200 people block Macmillan Yard - the second largest railyard in Canada - in solidarity. February 15 – Indigenous Services Minister Marc Miller meets the Mohawks in a ceremonial encounter on the CNR train tracks to renew a 17th Century treaty between the Iroquois and the British Crown known as the Silver Covenant Chain. Miller and the leaders of Tyendinaga then discussed the blockade. Miller asked for a temporary drawback of the protest but his request was refused after Wet'suwet'en hereditary Chief Woos, who was on the	

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	phone, stated that the RCMP was still on his territory and "they are out there with guns, threatening us." Leaked audio of the meetings included a Mohawk resident in the meeting telling the minister to "Get the red coats out first, get the blue coats out ... then we can maybe have some common discussions". February 16 – A demonstration temporarily blocks the Rainbow Bridge border crossing in Niagara Falls, Ontario. February 17 – A demonstration temporarily blocks the Thousand Islands Bridge border crossing in Ivy Lea, Ontario. February 18 – CNR temporarily lays off 450 employees for reasons related to the pipeline disruptions (they are recalled March 3). February 18 – Opposition leader Andrew Scheer condemns the federal government's response, calling it "the weakest response to a national crisis in Canadian history. Will our country be one of the rule of the law, or will our country be one of the rule of the mob?". Prime Minister Justin Trudeau holds a private meeting with the other opposition parties' leaders, barring Scheer after his comments. February 18 – The Assembly of First Nations (AFN) holds a press conference in Ottawa. AFN National Chief Perry Bellegarde called for all parties to engage in dialogue. "It's on everybody. It's not on any one individual. I'm just calling on all the parties to come together, get this dialogue started in a constructive way." February 19 – A blockade is set up on the Mont-Saint-Hilaire rail line in Saint-Lambert, Quebec, promising to stay until the RCMP leaves the disputed zone in Wet'suwet'en territory. The blockade caused Via Rail to postpone resuming service between Montreal and Quebec City.	

No.	QUESTION	OBJECTION
	February 19 - Individuals sabotage a rail line in Toronto, ON. February 19 – A group of about 20 members of a group calling itself the "Cuzzins for Wet'suwet'en" erects a blockade on a CN rail line in west Edmonton. CN obtains a court injunction, and less than twelve hours after the blockade began, it was dismantled by counter-protesters after a CN legal representative arrived to serve the injunction. February 19 – Via Rail announces temporary layoffs of up to 1,000 people due to the blockades. February 20 – The RCMP offers to close its Community Industry Security Office (CISO) on the Morice Road. February 20 – Another blockade of CPR tracks springs between Kamloops and Chase in British Columbia. The protesters left voluntarily on February 21, after the RCMP offered to leave the Wet'suwet'en land. The group vowed to return in four days if a dialogue was not started between the prime minister and the hereditary chiefs. February 20 - The Civilian Review and Complaints Commission (CRCC) for the RCMP issues a letter critical of RCMP procedures in the "checkpoint and exclusion zone" implemented on the Morice West Forest Service Road, stating the RCMP went beyond its legal authority to do ID checks of activists and searches of activists' vehicles. February 20 - Wetsuweten hereditary matriarch Rita George speaks out against the protests, saying they were not supported by the matriarchs and that the protesters are not following ancestral ways. February 21 – The Mont-Saint-Hilaire rail line is cleared after the Sûreté du Québec police arrive to enforce a CNR injunction	

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	February 21 – Prime Minister Trudeau calls for the barricades to come down. February 21 – The British Columbia Environmental Assessment Office (EAO) served notice that Coastal GasLink must halt construction on that segment and enter into talks with the Wet'suwet'en over the next 30 days. February 21 – Wet'suwet'en supporters block CNR rail lines near Moncton, New Brunswick. February 22 – After the hereditary chiefs made it a condition for talks with the federal government, the RCMP closes their CISO onsite office and moves to their detachment in Houston. February 22 - Anarchists in Hamilton, ON release a statement promising to blockade rails if the OPP clear the Tyendinaga blockade. February 23 – Mohawks at the Tyendinaga rail blockade are given notice by the OPP to clear their blockade by midnight to avoid prosecution for disobeying the injunction against the blockade. February 24 – The Tyendinaga Mohawks do not vacate the site. The OPP removes the blockade, arresting several of the protesters. February 24 – Immediately following the police action, new protests spring up in the province of Quebec, including a temporary rolling blockade of the Honoré Mercier Bridge near Montreal by Mohawks from Kahnawake, a new rail blockade by the Listuguj Mi'gmaq in the Gaspé Peninsula, and a barricade of Route 344 which was the site of the 1990 Oka Crisis. February 24 – Rail blockades come down in New Brunswick after being served with an injunction. February 24 – New protests form in British Columbia, blocking the BC Legislature, the	

No.	QUESTION	OBJECTION
	Port of Vancouver and rail lines in Hazelton and Kamloops. In Hazelton, 14 protesters, including three Gitxsan hereditary chiefs, are arrested. They are released overnight. February 24 - In a statement signed and supported by over 200 Canadian lawyers, Beverly Jacobs and Sylvia McAdam of the University of Windsor, Alex Neve of Amnesty International, and Harsha Walia of the BC Civil Liberties Association state that is the Canadian governments that are breaking international law, not the Wetsuweten hereditary chiefs and call for an end to the violation of indigenous persons' right to free, prior and informed consent. February 24 – Members of the Mohawk Nation (Bear Clan) from the Six Nations of the Grand River First Nation block Ontario Highway 6 in Caledonia in solidarity with the Wet'suwet'en. February 25 – Members of the Six Nations of the Grand River First Nation set up a rail blockade in Hamilton, causing the cancellation of train service between Aldershot and Niagara Falls stations. The GO Metrolinx agency replaced the rail service with shuttle buses. February 25 - A demonstration blocks commuter rail lines in Toronto, causing suspension of GO train service for several hours. Several protesters are arrested. February 25 - In Kanesatake, the blockade is reduced on Highway 344, allowing only a single lane of traffic through the territory. February 25 - Polling firm Ipsos releases a poll indicating that 63% of Canadians support the "intervention by police to end the blocking of key transportation corridors", while only 26% oppose police action. Additionally, 60% of Canadians are against the blockades, while 27% are in favour.	

No.	QUESTION	OBJECTION
	February 26 - A meeting between Wet'suwet'en hereditary chiefs and the BC and federal governments is cancelled, then rescheduled for February 27. February 27 - A few dozen activists, protesting the pipeline and the OPP actions, block rail lines in Kingston, Ontario for several hours. February 27 - TC Energy agrees to pause construction and the RCMP stops patrolling the Morice Forest Service Road to address the Wet'suwet'en hereditary chiefs' preconditions for talks with government ministers. February 27 - Canadian Crown-Indigenous Relations and Northern Development Minister Carolyn Bennett and B.C. Indigenous Relations Minister Scott Fraser arrive in Smithers, British Columbia begin two days of talks with the Wet'suwet'en hereditary chiefs. February 28 - Wet'suwet'en matriarchs join the meetings, demanding representation from all of the Wet'suwet'en people. March 2020 March 1 - After extending talks to three days, an agreement on land rights is reached, in the form of a Memorandum of Understanding (MOU). It is to be presented to the Wet'suwet'en Nation for ratification. March 2 - RCMP patrols resume and CGL construction work resumes. March 2 - A CNR rail bridge in Pointe-St-Charles, Quebec is blocked for several hours by protesters, who leave peacefully. March 3 - Via Rail resumes service on their Toronto-Montreal and Toronto-Ottawa lines. March 3 - CNR recalls the 450 workers it had temporarily laid off on February 18.	

No.	QUESTION	OBJECTION
	March 3 - A meeting is held at the Centennial Hall in Witset among the Laksilyu (Small Frog Clan), to discuss the tentative agreement reached between the hereditary chiefs and the representatives of the Canadian government. The meeting's attendees agree to the proposal on the spot. March 4 - University students at several universities across Canada walkout and hold protests in support of the Wet'suwet'en. March 4 - The Canadian, Via Rail's Toronto-Vancouver train, resumes partial service, as Via announces it is recalling most of the 1,000 employees "affected by temporary suspensions" starting on February 19. March 5 - The Mohawks of Kahnawake and the Listiguj First Nation dismantle their rail blockades in Quebec. March 5 - Five indigenous youth from the protest at the B.C. Legislature (which had begun February 11) are arrested, and the protest is dismantled. March 6 - The BC Civil Liberties Association and the Wet'suwet'en release a letter written by BC Minister Farnworth authorizing a redeployment of RCMP resources to support the injunction enforcement. In the BCCLA's opinion, the letter contradicts his later statement that the government does not direct the RCMP's activities. March 7 - Via Rail service has resumed on most routes, after disruption to more than 1,070 trips and roughly 165,000 passengers, according to Via Rail. Via Rail subsequently suspends The Canadian and Ocean services and reduces the frequency on the Winnipeg-Churchill route due to the COVID-19 pandemic, some time after the reinstatement announcement is made. March 8 - The Tsayu (Beaver Clan) hold a meeting at the Centennial Hall in Witset to	

No.	QUESTION	OBJECTION
	discuss the tentative agreement reached on March 1. March 10 - Speaking about the blockade on Highway 6 near Six Nations of the Grand River (begun February 24), Haldimand—Norfolk MPP Toby Barrett calls on anyone who can help to "tear down this blockade", citing the fact that businesses in the area are suffering. March 13 - Canada's Parliamentary Budget Officer Yves Giroux releases a report stating that the protests would have very little impact on economic growth, estimating that the impact would amount to a 0.01% fall in GDP, which he characterized as "a blip", and saying earlier warnings of shortages and economic downturn by corporations was "overblown". March 17 - The planned Wet'suwet'en all-clans meeting is postponed indefinitely amid a variety of concerns, including the COVID-19 pandemic and a death in the community (unrelated to COVID-19). March 19 - The blockade on Highway 6 near Six Nations of the Grand River is removed after protesters and Six Nations chief Mark Hill come together and decide to leave the road and move back to Douglas Creek estates, known in the Mohawk language as Kanonhstaton "the protected place", a site which had been a focal point for the long-standing Grand River land dispute. In a statement issued by the protesters, they say their departure is done "as a sign of good faith". March 20 - The OPP West Region says they are working with the Ministry of Transportation of Ontario (MTO) to remove concrete barriers they had set up around the protest. March 21 - The OPP West Region tweets that Highway 6 is expected to re-open over the (March 21–22) weekend.	

No.	QUESTION	OBJECTION
72.	You are aware of the February 17, 2022 attack on Coastal GasLink (CGL) and its employees?	Not relevant.
73.	Can you agree with the following description of February 17, 2022 attack on Coastal GasLink (CGL) from a third party source which references RCMP statements: Violence has erupted at a Coastal GasLink pipeline work site in Northern B.C., leaving workers shaken and millions of dollars in damage. Very early Thursday, just after midnight, Coastal GasLink security called RCMP for help, reporting it was under attack by about 20 people, some wielding axes. RCMP Chief Supt. Warren Brown, commander for the north district, called the attack a “calculated and organized violent attack that left its victims shaken and a multi-million dollar path of destruction.” Coastal GasLink said in a statement the attackers surrounded some of its workers in a “highly planned” and “unprovoked” assault near the Morice River drill pad site off the forest service road. “In one of the most concerning acts, an attempt was made to set a vehicle on fire while workers were inside,” said the company in a statement. “The attackers also wielded axes, swinging them at vehicles and through a truck’s window. Flare guns were also fired at workers.” The company said its workers fled. They were shaken, but no one was physically injured. Coastal GasLink said attackers used grinders to cut locks on a gate, entering an active construction site. They damaged heavy equipment and construction trailers,	Not relevant.

No.	QUESTION	OBJECTION
	causing millions of dollars in damage. More precise estimates were not yet available. The attackers also cut equipment hydraulic and fuel lines, causing dangerous leaks. The company said it was working to contain the environmental impact. Photos provided by RCMP showed the extent of the damage to the company's and contractors' equipment and property. At least two heavy excavators were toppled on to their sides, trucks were badly damaged and a portable office showed extensive damage to the exterior, with parts of its facade torn down. At the drill pad site, about 12 kilometres further down the road, officers documented damage to heavy machinery, fencing and portables.	
74.	It's understood that the RCMP created a document in 2021 regarding the status of the Canadian pipeline and railway protests titled "Royal Canadian Mounted Police Situation Report" that was authored and provided department heads of Indigenous Services Canada and Crown-Indigenous Relations prior to an October 19, 2021 meeting between them and Commissioner Brendan Lucki of the RCMP. The RCMP would have completed such "situation reports" or like reports with a different title regarding the protests and purported blockades in Ottawa and throughout Canada between January 27, 2022 and February 14, 2022?	Not relevant.
75.	Undertaking 10 of 10 – Will you undertake to produce all or any of the "situation reports" or like reports with a different title regarding the protests and purported blockades in Ottawa and throughout Canada between January 27, 2022, and February 14, 2022 that were authored or issued by the RCMP prior to the invocation of the Emergencies Act on February 14, 2022?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.

